

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

MASSACHUSETTS INSTITUTE OF
TECHNOLOGY,

Plaintiff,

V.

HARMAN INTERNATIONAL INDUSTRIES,
INCORPORATED,

Defendant.

Civil Action No. 05-10990-DPW
Magistrate Judge Judith G. Dein

**DEFENDANT HARMAN'S ASSENTED-TO MOTION FOR EXTENSION OF TIME
TO FILE MOTION FOR PROTECTIVE ORDER**

Pursuant to Federal Rule of Civil Procedure 6(b), Defendant Harman International Industries, Incorporated (“Harman”) hereby moves for a two-day extension of time for Harman to file and serve its Motion for a Protective Order. In support of this motion, Harman states as follows:

1. During the March 14, 2006 hearing on MIT's Motion to Compel, this Court ordered Harman to file a Motion for a Protective Order on or before March 20, 2006, "concerning any documents Harman claims it is entitled to withhold from production on the basis of German privacy laws." Order on Motion to Compel at 1 (Docket Entry 56).

2. The parties are currently attempting to reach a resolution without Court intervention which would comply with German privacy laws while providing discovery acceptable to MIT. Toward this end, the parties have met and conferred, and counsel for MIT has agreed to a two-day extension of time for Harman to file its Motion for a Protection Order or otherwise file a stipulated agreement reached between the parties.

WHEREFORE, Harman respectfully requests the Court to extend the time to and including March 22, 2006 for Harman to file its Motion for a Protective Order, or otherwise file a stipulated agreement reached between the parties.

Dated: March 20, 2006

Respectfully submitted,

Harman International Industries, Inc.,

/s/ Ann H. Chen

Robert J. Muldoon, Jr., BBO# 359480

James W. Matthews, BBO# 560560

Edward S. Cheng, BBO# 634063

Courtney A. Clark, BBO# 651381

SHERIN AND LODGEN, LLP

101 Federal Street

Boston, MA 02110

William A. Streff Jr., P.C.

Craig D. Leavell

Michelle A.H. Francis

Ann H. Chen

KIRKLAND & ELLIS LLP

200 E. Randolph Dr.

Chicago, IL 60601

(312) 861-2000 (phone)

(312) 861-2200 (fax)

Attorneys for Defendant

LOCAL RULE 7.1(A)(2) CERTIFICATE

Counsel for Harman International Industries, Incorporated hereby certify that they have conferred with opposing counsel on the matters set forth in the foregoing Motion and that plaintiff Massachusetts Institute of Technology has assented to this Motion.

/s/ Ann H. Chen
Ann H. Chen

CERTIFICATE OF SERVICE

I, Ann H. Chen, hereby certify that a copy of the foregoing DEFENDANT HARMAN'S ASSENTED-TO MOTION FOR EXTENSION OF TIME TO FILE MOTION FOR PROTECTIVE ORDER was sent by electronic-mail this 20th day of March, 2006, addressed to counsel for MIT as follows:

Steven M Bauer
Kimberly A. Mottley
Proskauer Rose LLP
One International Place, 14th Floor
Boston, MA 02110-2600
Email: sbauer@proskauer.com
kmottley@proskauer.com

Counsel for Plaintiff MIT

/s/ Ann H. Chen
One of the Attorneys for Harman